

EXHIBIT E

INDEX IN SUPPORT OF MOTION TO SEAL PORTIONS OF SAVEONSP'S MOTION TO COMPEL JJHCS TO ADD NINE CUSTODIANS (ECF NOS. 409, 427 & 451)

Material/Title of Document	Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury That Would Result if Relief Were Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing, if Any, and Basis
<u>Letter from E. Evans Wohlforth, Jr. to Judge Wolfson regarding SaveOnSP's Motion to Compel JJHCS to add nine additional custodians, dated October 9, 2024 (ECF No. 409)</u>	JJHCS requests the redaction of information in and exhibits to the October 9 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information.	If filed on the public docket, these portions of the October 9 letter and the exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information. Disclosure to the public of this confidential and proprietary information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	Exhibit 3 was previously sealed per ECF No. 448; Exhibit 5 was previously sealed per ECF No. 447.	None
Pages 3–20 Notes 3, 5–7, 9–13	Redactions discussing confidential exhibits				
Exhibits 1 & 2	Redactions to discovery responses containing confidential information				

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Exhibits 3–5, 9 & 16	Redactions to discovery letters discussing confidential documents		competitors secured the information.			
Exhibits 10–12, 34, 35, 64, 85, 90, 104, 106, 110, 111, 121, 122, 130, 132, 133, 135 & 138	Sealing of internal documents containing confidential information					

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury That Would Result if Relief Were Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing, if Any, and Basis
Exhibits 13–33, 36–63, 65–84, 86–87, 89, 91–103, 105, 107–09, 112–15, 117–120, 123–29, 131, 134, 136 & 137	Sealing of emails and attachments containing confidential information					
Exhibit 116	Redactions to discovery letters discussing confidential documents					

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<u>Letter from Jeffrey J. Greenbaum to Judge Wolfson in opposition to SaveOnSP's motion to compel, dated October 29, 2024 (ECF No. 427)</u>					
Pages 4–19 Notes 2, 4–7, 10–11	Redactions discussing confidential exhibits	JJHCS requests the redaction of information in and exhibits to the October 29 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information.	If filed on the public docket, these portions of the October 29 letter and the exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information. Disclosure to the public of this confidential and proprietary information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	Exhibits 2 and 4 were previously sealed per ECF No. 448. None
Exhibits 1–5 & 9	Redactions to discovery letters discussing confidential documents				

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Exhibit 6	Sealing of email discussing confidential information		competitors secured the information.			
Exhibit 7	Sealing of internal document containing confidential information					
Exhibit 8	Redactions to discovery responses containing confidential information					

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<u>Letter from E. Evans Wohlforth, Jr. to Judge Wolfson in reply to JJHCS's opposition to SaveOnSP's motion to compel, dated November 11, 2024 (ECF No. 451)</u>					
Pages 2–10 Notes 3–4, 6	Redactions discussing confidential exhibits	JJHCS requests the redaction of information in and exhibits to the November 11 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information.	If filed on the public docket, these portions of the November 11 letter and the exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information. Disclosure to the public of this confidential and proprietary information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None None
Exhibits 139, 141–43, 145 & 146	Sealing of emails and attachments containing confidential information				

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Exhibit 140	Sealing of document produced by non-party TrialCard Inc. containing confidential patient information		competitors secured the information. Disclosure of Exhibit 140 would also cause public disclosure of private health information.			
Exhibit 144	Sealing of internal document containing confidential information					